

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

KELLI FLOREK,

Plaintiff,

CASE NO. 8:22-cv-00194-MDN

v.

**NOTICE OF INTENT TO SERVE
SUBPOENAS DUCES TECUM**

CREIGHTON UNIVERSITY, KATIE
WADAS-THALKEN, RHONDA JONES
a/k/a RHONDA REESON and MARYANN
SKRABAL,

Defendants.

TO: Plaintiff, Kelli Florek in care of her attorney, Jason J. Bach

Defendants Creighton University, Katie Wadas-Thalken, Rhonda Jones, and Maryann Skrabal, by and through their attorneys of record, hereby serves notice that they will serve a Subpoena Duces Tecum on or about December 13, 2023¹, to the following entities:

University of Hawaii – HILO
ATTN: LEGAL DEPARTMENT
200 W. Kawili St.
Hilo, Hawaii 96720

Hawaii Community College
ATTN: LEGAL DEPARTMENT
1175 Manono Street
Hilo, HI 96720

commanding it to produce copies of Plaintiff's entire education and application file, including all college transcripts, Plaintiff's grades, completed coursework, credits and GPA, disciplinary records and reports, hearing notices, transcripts (if available), and

¹ Defendant may serve subpoenas sooner if Plaintiff agrees to waive the notice requirement.

decisions, and all other material whatsoever, without exception, relating the Plaintiff's education.

The subpoenas shall direct the production/inspection of the requested materials on or before December 27, 2023, by mailing or emailing the requested material to **Baird Holm LLP, Attn: Casey Grennan, 1700 Farnam St, Ste. 1500, Omaha, NE 68102** or emailed to grennan@bairdholm.com on or before December 27, 2023.

Dated this 5th day of December, 2023.

CREIGHTON UNIVERSITY, KATIE WADAS-
THALKEN, RHONDA JONES A/K/A RHONDA
REESON AND MARYANN
SKRABAL, Defendants,

By: /s/Scott P. Moore
Scott Parrish Moore (NE# 20752)
Sarah Huyck (NE# 27046)
of BAIRD HOLM LLP
1700 Farnam Street
Suite 1500
Omaha, NE 68102-2068
Phone: 402-344-0500
spmoore@bairdholm.com
shuyck@bairdholm.com

CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

Jason J. Bach
jbach@bachlawfirm.com

and I hereby certify that I have mailed by United States Postal Service, postage prepaid, this document to the following non CM/ECF participants:

None.

/s/ Scott P. Moore